REMARKS

The Applicants and the undersigned attorney thank Examiner Barqadle for carefully reviewing this application. Consideration of the present application is respectfully requested in view of the following remarks in conjunction with the claim amendments. In the Office Action dated March 9, 2006, the Examiner rejected Claims 1-11, 13-15, 17-21, and 23-25 under 35 U.S.C. §102(e) as anticipated by U.S. Patent Application No. 2001/0016873 to Ohkado et al. (hereinafter "Ohkado"). The Examiner rejected Claims 12, 16, 22, and 26 under 35 U.S.C. §103(a) as being unpatentable over Ohkado in view of U.S. Patent Application No. 2001/0016873 to Easwar (hereinafter "Easwar"). The Applicants have cancelled Claims 2, 4, 9-12, 15, 17-19, 21, and 25. The Applicants have amended Claims 1, 3, 6, 13, 14, 16, 20, and 22-24. Claims 27-42 have been added. Upon entry of this response, Claims 1, 3, 5-8, 13-14, 16, 20, 22-24, and 26-42 remain pending. Of these claims, Claims 1, 13, 20, 23, 29, 34, and 38 are independent claims.

Independent Claims 1, 13, 20, and 23 are Distinguishable from the Ohkado Reference

The Examiner contends that the Ohkado reference anticipates independent Claims 1, 13, 20, and 23. The Applicants respectfully submit that Ohkado fails to teach or suggest each and every limitation of amended Claims 1, 13, 20, and 23. The Applicants submit that, at a minimum, Ohkado fails to teach or suggest the feature of "translating the first input data instance in response to a request comprising a translation parameter from a system server module," as recited in independent Claims 13, 20, and 23. Also, Ohkado fails to teach or suggest at least the feature "operable to translate one or more data items from the first resource in response to a request from a second resource comprising a translation parameter," as recited by independent Claim 1.

Ohkado teaches a system and method for acquiring content that is being viewed by one participant in a collaboration, such as for a customer to collaborate with a customer service agent over the World Wide Web. The system and method of Ohkado helps ensure that the customer service agent views the same web page that is being viewed by the customer during the session.

See Ohkado at para. 0173 ("Such steps are carried out to allow the page displayed on the customer side to be displayed on the agent side."). Applets embedded in a web browser code trigger operations when a new web page has been loaded by that browser. These operations include revising a tree structure based on the new web page. Other participants in the collaboration have applets that compare the revised tree structure with the old structure. If a change is noted, the applets request the new web page from a cache manager. *See, e.g.*, Ohkado at paras. 0175-0185. For example, with the system and method of Ohkado, a new webpage would be loaded in the customer service agent's browser in response to a customer going to a new web page. The customer service agent does not request the customer's browser or computer translate images based on a specified "translation parameter" and send those images to the agent's computer. For example, the customer service agent browser does not request that the customer browser send browser images at a specific image size.

Nothing in Ohkado teaches or suggests "translat[ing] one or more data items from the first resource in response to a request from a second resource comprising a translation parameter," as required by amended independent Claims 13, 17, 20, and 23. Similarly, nothing in Ohkado teaches or suggests a system that is "operable to translate one or more data items from the first resource in response to a request from a second resource comprising a translation parameter," as required by amended independent Claim 1. Nowhere does Ohkado even suggest a "translation parameter."

Accordingly, since Ohkado fails to teach or suggest each and every element of amended independent Claims 1, 13, 20, and 23, the Applicants respectfully request that the Examiner withdraw his rejection of these claims, and Claims 3, 5-8 and new Claim 27; Claims 14, 16, and new Claim 28; Claim 22; and Claims 24 and 26, which depend from Claims 1, 13, 20, and 23, respectfully.

Applicants have not addressed each specific rejection of the independent claims because Applicants submit that the independent claims are allowable over the documents of record, as discussed above. Applicants have not acquiesced to any such rejection and reserves the right to address the patentability of any additional claim features in the future.

Dependent Claims 16, 22, and 26

Without commenting specifically on whether Easwar teaches or suggests the additional recitations of Claims 16, 22, and 26, the Applicants respectfully submit that the Examiner's rejection of dependent Claims 16, 22, and 26 is improper. First, as discussed above, Ohkado fails to teach or suggest each and every element of independent Claims 13, 20, and 23, from which Claims 16, 22, and 26 depend, respectively. As such, Ohkado does not anticipate these independent claims, as contended by the Examiner and, therefore, claims depending from these independent claims are patentable.

Second, nothing in Easwar or Ohkado would suggest to one of ordinary skill in the art that combining Easwar with Ohkado would arrive at the inventions of Claims 16, 22, and 26. The Examiner has not demonstrated that any motivation would exist to combine these two references. Indeed, as discussed above, nothing in Ohkado discusses or suggests that a user of the collaboration system, such as a customer service agent, would have any need to provide the system constraints for static images that are to be displayed on the agent's target device. All Ohkado discloses is that web pages are retrieved through a cache manager, which "fetches the html that has been stored in the cache." *See, e.g.*, Ohkado at para. 0185. Similarly, Easwar relates to improving the rendering quality of static images in a way that satisfies the unique architectures of different target devices, for example a desktop computer and a personal data assistant (PDA). Nothing in Easwar suggests that it can be combined with Ohkado's collaboration system.

Accordingly, the Applicants respectfully request that the Examiner withdraw his rejection of dependent Claim 16, 22, and 26 for this additional reason.

Other Dependent Claims

The Examiner also rejected dependent Claims 3, 5-8, 14, and 24 under 35 U.S.C. §102(e) as anticipated by Ohkado. The Applicants respectfully submit that Ohkado fails to teach or suggest the recitations of these claims for the reasons stated above in connection with independent Claims 1, 13, 20, and 23. Additionally, Ohkado fails to teach or suggest other recitations of these dependent claims. Some examples are listed below. These examples are

provided to further illustrate to the Examiner the inapplicability of Ohkado to the Applicants' claimed invention. By omitting certain recitations from the list below, the Applicants are not admitting that those elements are present in Ohkado.

- instantiating a virtual server (Claim 5). The Examiner contends that Ohkado's reference to a Java Virtual Machine (JVM) teaches or suggests the recitation of instantiating a virtual server, as recited in dependent Claim 5. The Applicants respectfully submit that a JVM is not instantiated to perform operations. Instead, a JVM permanently resides on a computer platform to run Java applications. *See, e.g.,* http://en.wikipedia.org/wiki/Java_virtual_machine (last visited July 11, 2006) (describing Java Virtual Machines).

- an adapter module not resident on a resource (Claim 8). The Examiner contends that paragraphs 0097-0100 of Ohkado teach or suggest a claim element comprising an adapter module that does not reside on the resource. The Applicants respectfully submit that nothing in these paragraphs provides for an adapter module that does not reside on a resource. These paragraphs summarize a preferred embodiment of Ohkado and fails to discuss an "adapter module" or where such a module may reside in a system.

Applicants have not addressed each specific rejection of the dependent claims because Applicants submit that the independent claims are allowable over the documents of record, as discussed above. Applicants have not acquiesced to any such rejection and reserves the right to address the patentability of any additional claim features in the future.

Claims 2, 4, 9-12, 15, 17-19, 21 and 25

The Applicants have cancelled Claims 2, 4, 9-12, 15, 17-19, 21, and 25 without prejudice to or disclaimer of the subject matter recited therein. These claims have been cancelled to better focus the claimed subject matter and not for reasons of patentability.

New Claims 27-42

The Applicants have added Claims 27-42 to provide an additional scope of protection commensurate with the original disclosure. Claims 29, 34, and 38 are independent claims. Nothing in these claims constitutes new matter.

Applicants assert that Ohkado fails to teach or suggest at least the feature where a first adapter module is "operable to format a computer screen image in response to a request from a second computer, the request comprising a maximum image size," as recited by independent Claim 29; and at least the feature of "receiving at a first computer a request from a second computer to view a computer screen image associated with the first computer, the request comprising an identity and a size of the computer screen image desired to be received by the second computer" as recited by independent Claim 34. Also, Ohkado fails to teach or suggest at least the features of "comparing the size of the computer screen image requested by the first computer with the size of the computer screen image requested by the third computer to determine which request includes the largest size;" "sending to the second computer the request that comprises the largest size of the computer screen image," and "processing at the server the received computer screen image to conform the computer screen image to the smaller of the sizes requested by the first computer and the third computer" as recited by independent Claim 38. More generally, Ohkado fails to teach or suggest a request that comprises the size of an image. Similarly, Easwar fails to teach or suggest a *request* comprising an image size.
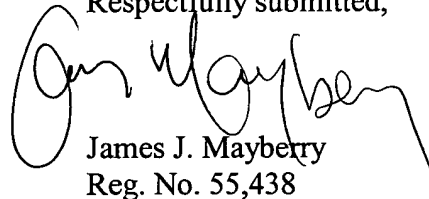
Accordingly, the Applicants respectfully request that the Examiner allow new independent Claims 29, 34, and 38, and Claims 30-33; 35-37; and 39-42, which depend from Claims 29, 34, and 38, respectfully.

CONCLUSION

The foregoing is submitted as a full and complete response to the Office Action mailed on March 9, 2006. The Applicants and the undersigned thank Examiner Barqadle for considering these amendments and remarks. The Applicants respectfully submit that the present application is in condition for allowance. Such action is hereby courteously solicited.

If the Examiner believes issues exist that can be resolved by telephone conference, or any formalities exist that we can correct by an Examiner's Amendment, please contact the undersigned at (404) 572-3538.

Respectfully submitted,

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